

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE :
COMMISSION, :
Plaintiff, : Case No. 17 Civ. 7994 (AT) (DCF)
v. :
RIO TINTO PLC, RIO TINTO LIMITED, :
THOMAS ALBANESE and GUY ROBERT :
ELLIOTT, :
Defendants. :
-----X

**NOTICE OF DEFENDANTS' CONSOLIDATED DAUBERT MOTIONS
TO EXCLUDE EXPERT OPINIONS AND TESTIMONY**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Consolidated *Daubert* Motions to Exclude Expert Opinions and Testimony, the Declaration of Richard W. Grime dated April 12, 2021 and its exhibits, the Notice of Motion, and such other and further papers and proceedings as may be filed or had, Defendants Rio Tinto PLC, Rio Tinto Limited, Thomas Albanese, and Guy Robert Elliott, by and through their counsel, will move this Court before the Honorable Analisa Torres, United States District Judge, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15D, New York, New York 10007, at a time and date to be determined by this Court, for an Order excluding certain opinions and testimony by Plaintiff's experts pursuant to the Federal Rules of Evidence and the *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), line of cases.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to the Order signed and dated on March 19, 2021 (ECF No. 216), answering papers, if any, are to be served on or before May 12, 2021, and reply papers, if any, are to be served on or before May 26, 2021.

Dated: New York, New York
April 12, 2021

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Respectfully submitted,

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